

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARTINUS ANTUAN SAYLES

[DOB: 03/21/1977],

MAURICE SUTON ANTON SAYLES,

a/k/a “Ish” Washington,

[DOB: 03/21/1977],

and

MICHAEL A. MOODY

[DOB: 10/07/1993],

Defendants.

Defendants/Counts:

Martinus Sayles: 1

Maurice Sayles: 1, 2, 3, and 9

Moody: 1, and 4-8

) **No. 12-03036-01/03-CR-S-DGK**

)

) **COUNT ONE**

) **(Conspiracy to Commit Wire Fraud)**

) 18 U.S.C. §§ 1343 and 1349

) NMT 20 Years Imprisonment

) NMT \$250,000 Fine

) NMT 3 Years Supervised Release

) Class C Felony

) Mandatory Restitution

)

) **COUNTS TWO THROUGH NINE**

) **(Wire Fraud)**

) 18 U.S.C. §§ 1343 and 2

) NMT 20 Years Imprisonment

) NMT \$250,000 Fine

) NMT 3 Years Supervised Release

) Class C Felony

) Mandatory Restitution

)

) \$100 Mandatory Special

) Assessment-Each Count

)

)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy-Title 18, United States Code, Sections 1343 and 1349)

THE CONSPIRACY AND ITS OBJECTS

1. From March 31, 2011, through August 5, 2011, said dates being approximate, in Greene County, in the Western District of Missouri, and elsewhere, the defendants, MARTINUS ANTUAN SAYLES, MAURICE SUTON ANTON SAYLES, a/k/a “Ish” Washington, and MICHAEL A. MOODY, did voluntarily, intentionally and knowingly conspire and agree with each other, and with

other persons known and unknown to the Grand Jury, to commit the offense of wire fraud, contrary to the provisions of Title 18, United States Code Section 1343.

MANNER AND MEANS OF THE CONSPIRACY

2. From March 31, 2011, through August 5, 2011, said dates being approximate, the defendants obtained stolen checks belonging to various businesses and individuals. Defendants MARTINUS ANTUAN SAYLES and MAURICE SUTON ANTON SAYLES, a/k/a "Ish" Washington, then forged and altered the checks by cutting out digits from the routing and account numbers, and replacing them with other digits via glue and hammer.

3. The defendants then passed the forged and altered checks at various retail stores and other businesses throughout the Springfield, Missouri, area, and elsewhere. Defendants MARTINUS ANTUAN SAYLES and MAURICE SUTON ANTON SAYLES, a/k/a "Ish" Washington, also recruited others to pass the forged and altered checks for them.

4. On occasions, the defendants, and other individuals recruited by defendants MARTINUS ANTUAN SAYLES and MAURICE SUTON ANTON SAYLES, a/k/a "Ish" Washington, passed the forged and altered checks using the assistance of false identification. Defendant MAURICE SUTON ANTON SAYLES, a/k/a "Ish" Washington, created the false identifications using a label maker to alter the existing identification card or driver's license of the individual passing the check, to match the name of the account holder on the check.

5. The defendants then returned the merchandise they purchased for a cash refund of the purchase price. Defendants MARTINUS ANTUAN SAYLES and MAURICE SUTON ANTON SAYLES, a/k/a "Ish" Washington, also recruited others to return the merchandise for them, and to remit the monies they received to the defendants. In exchange, defendants MARTINUS ANTUAN

SAYLES and MAURICE SUTON ANTON SAYLES, a/k/a “Ish” Washington, provided these subjects with food, shelter and clothing.

6. Many times, the defendants facilitated the return of the stolen merchandise by altering the purchase receipts to appear as though the purchases had occurred more than 10-days before the returns. This was done to circumvent the 10-day return policy most stores had in place, which required customers paying by check to wait at least 10 days before returning merchandise, in order to ensure the check had cleared the bank before any refund was issued.

7. All in violation of Title 18, United States Code, Section 1349.

COUNTS TWO THROUGH NINE

(Wire Fraud-Title 18, United States Code, Sections 1343 and 2)

(The Scheme)

8. From March 31, 2011, through August 5, 2011, said dates being approximate, in Greene County in the Western District of Missouri, and elsewhere, the defendants, MARTINUS ANTUAN SAYLES, MAURICE SUTON ANTON SAYLES, a/k/a “Ish” Washington, and MICHAEL A. MOODY, devised a scheme and artifice to defraud and to obtain money and other things from various retail stores and other businesses, by means of materially false or fraudulent pretenses, representations, or promises.

9. The factual allegations contained in paragraphs 2-6 of this indictment are incorporated by reference herein to fully describe the scheme and artifice devised by MARTINUS ANTUAN SAYLES, MAURICE SUTON ANTON SAYLES, a/k/a “Ish” Washington, and MICHAEL A. MOODY, and others known and unknown to the Grand Jury.

(The Charges)

10. On or about the dates set forth below in each individual count, in the County identified in each individual count, in the Western District of Missouri, and elsewhere, the defendants listed in each individual count, for the purpose of executing the scheme, did knowingly cause to be electronically transmitted over telephone lines in interstate commerce by means of wire communications, certain writings, signs, signals, pictures and sounds, that is, funds, from the bank accounts of the below-listed businesses, all located in Springfield, Greene County, Missouri, to the Federal Reserve Bank in Cleveland, Ohio, and o the financial institutions listed on the below-listed stolen, forged and altered checks:

COUNT	DATE	ACT OR ATTEMPTED ACT OF EXECUTION
2	March 31, 2011	MAURICE SUTON ANTON SAYLES, a/k/a "Ish" Washington, possessed and passed stolen, altered and forged check number 1171, in the amount of \$205.39, at Walmart #2221, located at 2021 E. Independence Road, Springfield, Greene County, Missouri. The check was drawn on the account of B.B., at Mid-Missouri Bank.
3	April 2, 2011	MAURICE SUTON ANTON SAYLES, a/k/a "Ish" Washington, possessed and passed stolen, altered and forged check number 1175, in the amount of \$202.07, at Walmart #0179, located at 3520 W. Sunshine, Springfield, Greene County, Missouri. The check was drawn on the account of B.B., at Mid-Missouri Bank.
4	May 25, 2011	MICHAEL A. MOODY possessed and passed a stolen, altered and forged check drawn on the account of D.H., Jr., at Hobby Lobby in Springfield, Greene County, Missouri.
5	June 11, 2011	MICHAEL A. MOODY possessed and passed stolen, altered and forged check number 2415, in the amount of \$115.97, at All Pet Supplies in Springfield, Greene County, Missouri. The check was drawn on the account of Nebraska National Round-Up Committee, at Wells Fargo Bank, N.A., Nebraska.
6	June 14, 2011	MICHAEL A. MOODY possessed and passed stolen, altered and forged check number 2424, in the amount of

		\$255.95, at Pet Warehouse, located at 2920 E. Sunshine, Springfield, Greene County, Missouri. The check was drawn on the account of Nebraska National Round-Up Committee, at Wells Fargo Bank, N.A., Nebraska.
7	June 16, 2011	MICHAEL A. MOODY possessed and passed stolen, altered and forged check number 2033, in the amount of \$40, at Rapid Roberts, located at 3106 W. Battlefield, Springfield, Greene County, Missouri. The check was drawn on the U.S. Bank account of W.M.R., in Sikeston, Missouri.
8	June 16, 2011	MICHAEL A. MOODY possessed and attempted to pass a stolen, altered and forged check drawn on the U.S. Bank account of W.M.R., Sikeston, Missouri, at Best Buy located at 3450 S. Glenstone, Springfield, Greene County, Missouri, using false identification in the name of W.M.R.
9	August 3, 2011	N.W. possessed and attempted to pass a stolen, altered and forged check in the amount of \$95.45 at Rapid Roberts, located at 3106 W. Battlefield, Springfield, Greene County, Missouri, at the direction of MAURICE SUTON ANTON SAYLES, a/k/a "Ish" Washington. The check was drawn on the account of Nebraska National Round-Up Committee, at Wells Fargo Bank, N.A., Nebraska.

11. All in violation of Title 18, United States Code, Sections 1343 and 2.

A TRUE BILL

/s/
FOREPERSON OF THE GRAND JURY

/s/ Robyn L. McKee
ROBYN L. MCKEE
Assistant United States Attorney

DATED: April 4, 2012